

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

ANANDA CAMARGO CHAVEZ,
Plaintiff,

v.

REBUILT BROKERAGE LLC d/b/a
REBUILT REALTY AND REBUILT
OFFERS LLC
Defendant.

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Case No. 1:24-cv-504-RP

**JOINT MOTION FOR LEAVE
TO FILE RESPONSE IN EXCESS OF PAGE LIMITS**

COMES NOW, Plaintiff Ananda Camargo Chavez (“plaintiff”) and Defendant Rebuilt Brokerage LLC d/b/a Rebuilt Realty And Rebuilt Offers LLC (“Defendants”) (collectively the “Parties”), and files this Joint Motion for Leave to File Response in Excess of Page Limits follows:

I.

1. Plaintiff filed her Motion for Class Certification on March 20, 2025. Doc. 34.
2. Pursuant to the briefing scheduling, Defendants’ response is due on April 21, 2025. Doc. 38.
3. The Western District of Texas Local Rule CV-7(c)(2), “[u]nless otherwise authorized by the court, discovery and case management motions are limited to 10 pages, and other motions are limited to 20 pages. These page limits are exclusive of the caption, the signature block, any certificate, and any accompanying documents.”
4. To this end, Defendant seeks leave from the Court to file a response to Plaintiff’s Motion for Class Certification that exceeds the pages limits set forth in Western District of Texas Local Rule CV-7(c)(2).

5. Defendant's propose response to the class certification motion is twenty-five pages, exclusive of the caption, the signature block, and any certificate.

6. The Response is lengthy due to the complex issues raised in Plaintiff's Motion for Class Certification, as well as the impact the granting or denial of said motion would have on the future disposition of this case.

7. For these reasons, Rebuilt seeks this extension so that it can properly present its defenses.

8. In anticipation of Plaintiff's Reply exceeding the page lengths, Plaintiff also requests leave to file a Reply brief that exceeds the page limits by five (5) pages as well.

9. Defendants are unopposed to this relief.

10. To this end, the parties file this motion jointly, both seeking leave to file a Response Brief and Reply Brief, respectively, that exceeds the page limits set forth in the Local Rules by five (5) pages.

11. The request is not requested for delay but so that justice might be done.

WHEREFORE, PREMISES CONSIDERED, the Parties jointly request this Court grant this Joint Motion for Leave to File Response in Excess of Page Limits and allow the Parties to file a file a Response Brief and Reply Brief, respectively, that exceeds the page limits set forth in the Local Rules by five (5) pages.

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AGREED AS TO FORM AND CONTENT, AND RESPECTFULLY SUBMITTED:

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/s/ Andrew Roman Perrong
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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been forwarded via **CM/ECF** system to all parties entitled to notice of the same on this 21st day of April 2025.

/s/ Xerxes Martin
EUGENE XERXES MARTIN, IV